

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

UNITED STATES OF AMERICA)

v.)

JEFFREY BURSTEIN;)

MAGDIEL CASTRO)

a/k/a MIKE CASTRO;)

MARCOS CAVALCANTE;)

WILLIAM F. CLINTON; and)

JEFFREY RICHMAN)

No. 4:06CR **00072-01-WKW**

18 U.S.C. § 1832 (a) (2)

18 U.S.C. § 1512 (c) (1)

18 U.S.C. § 1030 (a) (2) (C)

18 U.S.C. § 2

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

INFORMATION

FEB 22 2006

THE UNITED STATES ATTORNEY CHARGES:

JAMES W. McCORMACK, CLERK
By: *[Signature]*
DEP. CLERK

COUNT ONE

From in or about April 2002 through in or about March 2003
in the Eastern District of Arkansas and elsewhere,

JEFFREY BURSTEIN

with intent to convert a trade secret that is placed in
interstate commerce, to the economic benefit of anyone other than
the owner thereof, knowing the offense would injure the owner of
that trade secret, knowingly without authorization downloaded
such information.

All in violation of Title 18, United States Code, Section
1832 (a) (2).

COUNT TWO

On or after August 7, 2003 in the Eastern District of
Arkansas and elsewhere,

MAGDIEL CASTRO
a/k/a MIKE CASTRO and
JEFFREY RICHMAN,

together with another individual known to the United States

Attorney, aiding and abetting one another attempted to corruptly alter, destroy, mutilate and conceal objects, that is computers, with the intent to impair the objects' integrity and availability for use in an official proceeding.

All in violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

COUNT THREE

From on or about June 2, 2003 through on or about August 1, 2003, in the Eastern District of Arkansas and elsewhere,

MARCOS CAVALCANTE

and others known to the United States Attorney, aiding and abetting one another, intentionally exceeded authorized access of a computer and thereby obtained information from a protected computer involved in interstate communication for purposes of commercial advantage and private financial gain and the value of the information exceeded \$5,000.00.

All in violation of Title 18, United States Code, Sections 1030(a)(2)(C), 1030(c)(2)(B)(i) and (iii), and 2.

COUNT FOUR

From on or about March 31, 2003 through on or about May 27, 2003, in the Eastern District of Arkansas and elsewhere,

WILLIAM F. CLINTON

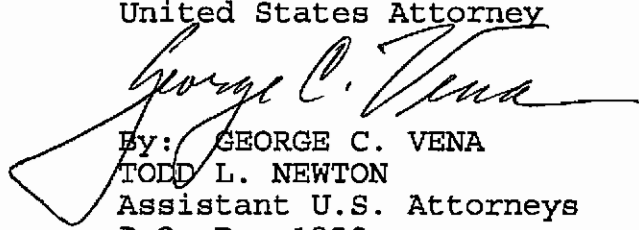
with intent to convert a trade secret that is placed in interstate commerce, to the economic benefit of anyone other than the owner thereof, knowing the offense would injure the owner of

that trade secret, knowingly without authorization downloaded such information.

All in violation of Title 18, United States Code, Section 1832(a)(2).

Respectfully submitted,

BUD CUMMINS
United States Attorney



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